



**DEPARTMENT OF DEFENSE
DEPENDENTS SCHOOLS
OFFICE OF THE DIRECTOR, EUROPE
UNIT 29649 BOX 7000
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August 24, 2006

MEMORANDUM FOR DIVISION CHIEFS, DODDS-E
DISTRICT SUPERINTENDENTS, DODDS-E
PRINCIPALS, DoDDS-E

SUBJECT: Standard Operating Procedures (SOP) for Ensuring Compliance with Annual Ethics Requirements

REFERENCES: 5 C.F.R. 2638.703 and 704; 5 C.F.R. 2643.901 to 1004; DoD 5500.7-R, Joint Ethics Regulation 7-300 to 7-310, 11-200

A) PURPOSE: To establish procedures for ensuring compliance with annual ethics requirements.

B) APPLICABILITY: This applies to all DoDDS-E employees.

C) DEFINITIONS:

Covered Employee:

1. An employee who participates personally and substantially, through decision or exercise of significant judgment, and without substantial supervision and review, in taking official action regarding: (i) contracting or procurement; (ii) administering or monitoring grants, subsidies, licenses, or other Federal benefits; (iii) regulating or auditing any non-Federal entity; or (iv) other activities in which the final decision may have a direct and substantial economic impact on the interests of any non-Federal entity; or
2. An employee whose position requires the filing of an OGE 450, Confidential Financial Disclosure Report (OGE 450) to avoid involvement in a real or apparent conflict of interest.

D) PROCEDURES AND RESPONSIBILITIES:

1. Supervisors must:

- a. Determine whether any newly assigned subordinate employee is a "covered employee" as defined above. Supervisors should consult with the Assistant General Counsel, DoDDS-E, as necessary, in making this determination.

b. Ensure that newly assigned covered employees submit to the supervisor a completed OGE 450. The supervisor must review the OGE 450 and forward to the Assistant General Counsel, DoDDS-E, within 30 days of the employee's appointment.

c. Ensure that all covered employees submit to the supervisor a completed OGE 450 by January 15. The supervisor must review the OGE 450 and forward to the Assistant General Counsel, DoDDS-E, by January 30.

d. Ensure that all covered employees meet the annual training requirement by reviewing: Executive Order 12674 located at http://www.usoge.gov/pages/laws_regs_fedreg_stats/lrfs_files/xeorders/eo12731.html, the Employee's Guide to the Standards of Conduct located at http://www.dodea.edu/foia/iod/pdf/EmployeeGuide_20060125.pdf, Guidance on Post-Employment Restrictions located at <http://www.dodea.edu/counsel/pdf/socoseek.pdf>; and by completing the online ethics training module provided by the DoD Standards of Conduct Office at http://www.dod.mil/dodgc/defense_ethics/ no later than December 31.

e. Ensure that all newly assigned subordinate employees complete, within 90 days of their appointment, initial ethics training and provide their supervisor a copy of the certificate of completion. For further information, see the attachment.

2. Covered employees must:

a. Submit to their supervisor a completed initial OGE 450 within 21 days of their appointment.

b. Submit to their supervisor a completed annual OGE 450 by January 15.

c. Comply with the annual ethics training requirement by December 31.

E) EFFECTIVE DATE: The effective date of this SOP is August 25, 2006.



Diana J. Ohman
Director, DoDDS-E

cc:
Deputy Director, DoDDS-E

Attachment:
As stated